

FILED

JUL 17 2002

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**GRANT PRICE
CLERK, U.S. BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA
BY  DEPUTY

IN RE:

John Stephen Hahn

Sharon Marie Hahn dba

Creative Memories

DEBTOR(S)

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Case No.: 02-14105 WV

Chapter: 7

**MOTION FOR ORDER OF ABANDONMENT,
MOTION FOR RELIEF FROM AUTOMATIC STAY
AND BRIEF IN SUPPORT THEREOF**

COMES NOW THE CREDITOR, Countrywide Home Loans Inc., d/b/a America's Wholesale Lender (hereinafter "Movant"), and moves the Court to grant relief from the automatic stay imposed herein so as to allow Movant to enforce its claims against the following real estate located in Oklahoma County, Oklahoma, and further to require the Trustee to abandon all interest he may have in said property, to-wit:

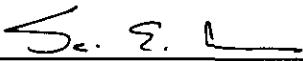
All of Lots Twenty-five (25) and Twenty-six (26) in Block Five (5) in COLLEGE ADDITION to Oklahoma City, Oklahoma County, State of Oklahoma, according to the recorded plat thereof.

IN SUPPORT OF THIS REQUEST, the Movant would state to the Court that no equity exists in the property which is secured by a Note and Mortgage to Movant, upon which there is a debt of approximately \$30,789.49, with interest thereon at the rate of 9.2500% per annum from the 1st day of October, 2001, until paid, plus costs and fees, as provided for in said Note and Mortgage.

WHEREFORE, your Movant prays that it be granted relief from the stay to proceed with the foreclosure action and to further require the Trustee to abandon his interest herein as burdensome.

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**KIVELL, RAYMENT, FRANCIS, COULSON
AND HEATH**
A Professional Corporation


By: 

Scott E. Coulson, OBA #12622
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7666 East 61st Street
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ATTORNEYS FOR CREDITOR

CERTIFICATE OF MAILING/ELECTRONIC TRANSMISSION

I, Karen M. Funk, hereby certify that on this 12th day of July, 2002, I mailed or electronically transmitted, with confirmation of receipt, a true and correct copy of the above and foregoing Motion to those parties listed on the matrix on file herein, with sufficient postage thereon.



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Janice Loyd
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JACKSONVILLE FL 32255

AT&T UNIVERSAL CARD
PO BOX 6906
THE LAKES NV 88901-6906

BANK OF OKLAHOMA
PO BOX 2864
TULSA OK 74101-2864

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